

**Exhibit 6C**

**8/4/2014 Deposition Transcript of B. Stibitz (excerpted)**

BROM STIBITZ  
IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN

In re ) Chapter 9  
CITY OF DETROIT, MICHIGAN, ) Case No. 13-53846  
Debtor. ) Hon. Steven W. Rhodes

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The Videotaped Deposition of BROM STIBITZ,  
a 30(b)(6) witness,  
Taken at 215 South Washington Square, Suite 200,  
Lansing, Michigan,  
Commencing at 12:59 p.m.,  
Monday, August 4, 2014,  
Before Rebecca L. Russo, CSR-2759, RMR, CRR.

<p style="text-align: right;">Page 81</p> <p>1 BROM STIBITZ</p> <p>2 without City authorization?</p> <p>3 A. No.</p> <p>4 Q. And what about the NHL arena? At this time is that</p> <p>5 set to go forward?</p> <p>6 A. My understanding is yes.</p> <p>7 Q. Is it your understanding that the State has allocated</p> <p>8 funds and put those aside already for the NHL arena?</p> <p>9 A. I don't know.</p> <p>10 Q. Do you know whether the City, City leaders have</p> <p>11 accepted the proposal at this time for the NHL arena?</p> <p>12 A. I don't know.</p> <p>13 MS. NELSON: We can get those answers if</p> <p>14 you want them, within five minutes.</p> <p>15 MR. MCCARTHY: Why don't we do that at the</p> <p>16 next break, if it's a good time.</p> <p>17 MS. RUTNER: Yeah, we'll talk about it at</p> <p>18 the next break, actually, yeah.</p> <p>19 BY MS. RUTNER:</p> <p>20 Q. Now, putting aside the State proposal, proposals for</p> <p>21 these projects, did the State ever consider providing</p> <p>22 the City with any loans?</p> <p>23 A. Not that I'm aware of.</p> <p>24 Q. So in the days leading up to the bankruptcy, you're</p> <p>25 not aware of any considerations or discussions at the</p>	<p style="text-align: right;">Page 83</p> <p>1 BROM STIBITZ</p> <p>2 brought against the State by the pensioners?</p> <p>3 MS. NELSON: Well, I'm going to object,</p> <p>4 first of all, because those discussions are</p> <p>5 principally attorney-client privilege, and the State's</p> <p>6 discussions and its answers are set forth in the</p> <p>7 interrogatory responses to the public safety union's</p> <p>8 interrogatories.</p> <p>9 BY MS. RUTNER:</p> <p>10 Q. Outside of discussions with your -- with attorneys</p> <p>11 present, do you know of any discussions amongst State</p> <p>12 officials regarding potential claims brought against</p> <p>13 the State by the pensioners?</p> <p>14 A. No.</p> <p>15 Q. Outside of communications with counsel, what is the</p> <p>16 State's understanding of the basis for any potential</p> <p>17 liability for claims brought against it by the</p> <p>18 pensioners, in other words, the arguments --</p> <p>19 MR. MORRIS: Objection, form.</p> <p>20 BY MS. RUTNER:</p> <p>21 Q. -- you are raising?</p> <p>22 A. I'm sorry, could you restate the question?</p> <p>23 Q. Sure. Outside of any communications with counsel,</p> <p>24 what is the State's understanding as to the basis of</p> <p>25 any potential liability for claims brought against the</p>
<p style="text-align: right;">Page 82</p> <p>1 BROM STIBITZ</p> <p>2 State with respect to providing the City with a loan?</p> <p>3 A. Not that I recall.</p> <p>4 Q. Do you know of anybody at the State who might know</p> <p>5 about that?</p> <p>6 A. No.</p> <p>7 Q. Okay, if you could turn back to -- I apologize.</p> <p>8 All right, if you could turn back to the</p> <p>9 subpoena, which is Exhibit 1, let's take a look at</p> <p>10 topic five, which is on the bottom of page 6.</p> <p>11 What did you do to prepare to testify for</p> <p>12 this topic?</p> <p>13 A. I reviewed the, the State Contribution Agreement, and</p> <p>14 I reviewed their responses to the interrogatories from</p> <p>15 the public safety unions. I reviewed the legislation</p> <p>16 associated with the State contribution.</p> <p>17 Q. Do you have any personal knowledge as to the issues in</p> <p>18 topic five outside of what you did to prepare for the</p> <p>19 deposition?</p> <p>20 A. No.</p> <p>21 Q. Okay, let's walk through any communications among</p> <p>22 State officials regarding potential claims that could</p> <p>23 be brought against the State by the pensioners.</p> <p>24 Have there been any discussions among State</p> <p>25 officials regarding potential, potential claims</p>	<p style="text-align: right;">Page 84</p> <p>1 BROM STIBITZ</p> <p>2 State by the pensioners?</p> <p>3 MS. NELSON: Well, I'm going to object --</p> <p>4 MR. MORRIS: Objection.</p> <p>5 MS. NELSON: I'm going to object as to form</p> <p>6 and foundation, because he's already indicated there</p> <p>7 were no discussions amongst State officials outside of</p> <p>8 their counsel regarding potential claims, in answer to</p> <p>9 your last question.</p> <p>10 BY MS. RUTNER:</p> <p>11 Q. So as you sit here today, are you aware, are you aware</p> <p>12 of any -- of what the State's understanding is outside</p> <p>13 of any communications with counsel as to the basis of</p> <p>14 any potential liability for claims brought against it</p> <p>15 by the pensioners?</p> <p>16 MR. MORRIS: Object to form.</p> <p>17 A. The State's position is that there are no claims.</p> <p>18 BY MS. RUTNER:</p> <p>19 Q. But what I'm asking about is, what is the State's</p> <p>20 understanding of the arguments that the pensioners are</p> <p>21 raising against the State?</p> <p>22 MR. MORRIS: Object to form.</p> <p>23 MS. RUTNER:</p> <p>24 Q. Or the basis for liability?</p> <p>25 MS. NELSON: By who?</p>

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<p style="text-align: right;">Page 85</p> <p>1 BROM STIBITZ</p> <p>2 MR. MORRIS: Object to form.</p> <p>3 MS. RUTNER: The basis for liability by the</p> <p>4 pensioners -- excuse me, by the, the basis for</p> <p>5 liability that the pensioners are, are asserting</p> <p>6 against the State.</p> <p>7 MR. MORRIS: Object to form.</p> <p>8 MS. NELSON: Well, number one, that goes to</p> <p>9 the confidentiality of the mediation agreement, and I</p> <p>10 would have to instruct him not to answer on that</p> <p>11 ground, and two, it's attorney-client privilege.</p> <p>12 MS. RUTNER: So are you instructing him not</p> <p>13 to answer?</p> <p>14 MS. NELSON: Yes.</p> <p>15 BY MS. RUTNER:</p> <p>16 Q. And are you going to follow that instruction?</p> <p>17 A. Yes.</p> <p>18 Q. Has the State's position ever changed with respect to</p> <p>19 its concern about its potential liability for claims</p> <p>20 raised by the pensioners?</p> <p>21 MS. NELSON: Objection --</p> <p>22 MR. MORRIS: Object to form.</p> <p>23 MS. NELSON: Objection, it invades the</p> <p>24 confidentiality of the mediation process, and I</p> <p>25 instruct him not to answer.</p>	<p style="text-align: right;">Page 87</p> <p>1 BROM STIBITZ</p> <p>2 MARKED FOR IDENTIFICATION:</p> <p>3 DEPOSITION EXHIBIT 7</p> <p>4 3:00 p.m.</p> <p>5 BY MS. RUTNER:</p> <p>6 Q. If you see the first answer, have you reviewed this</p> <p>7 response?</p> <p>8 A. Yes.</p> <p>9 Q. And are you familiar with the contents of it?</p> <p>10 A. Yes.</p> <p>11 Q. Do you know who at the State was involved in making</p> <p>12 the decision that, and I'm quoting from the</p> <p>13 interrogatory response: There are no valid claims</p> <p>14 that can be or have been asserted against the State,</p> <p>15 the State entities, or the State-related entities by</p> <p>16 any person?</p> <p>17 A. No.</p> <p>18 Q. Do you know if the State conducted any sort of</p> <p>19 analysis about the reliability specifically in</p> <p>20 response to this interrogatory, or was it a -- or was</p> <p>21 this response made based on an analysis that predated</p> <p>22 the interrogatory?</p> <p>23 A. I don't know.</p> <p>24 Q. I want to understand, and this is outside of any</p> <p>25 communications with your attorney, what exactly is the</p>
<p style="text-align: right;">Page 86</p> <p>1 BROM STIBITZ</p> <p>2 MS. RUTNER: I'm referring to prior to the</p> <p>3 mediation.</p> <p>4 BY MS. RUTNER:</p> <p>5 Q. Was there ever a time in which, or has there ever been</p> <p>6 a time in which the State's position was one thing</p> <p>7 with respect to what they felt -- or with respect to</p> <p>8 their concerns about the pensioners' potential claims</p> <p>9 against the State and then that position changed?</p> <p>10 MR. MORRIS: Object to form.</p> <p>11 MS. NELSON: Well, again, the second</p> <p>12 portion of your question I object to, because it</p> <p>13 invades the confidentiality of the mediation</p> <p>14 process --</p> <p>15 MS. RUTNER: I'm only referring to --</p> <p>16 MS. NELSON: -- which is a give and take.</p> <p>17 MS. RUTNER: -- I'm only referring to</p> <p>18 conversations or -- conversations or discussions or</p> <p>19 communications or anything prior to August 13th, 2013.</p> <p>20 MR. MORRIS: Same objection.</p> <p>21 A. Not to my knowledge.</p> <p>22 MS. RUTNER: I'm marking as Exhibit 10 --</p> <p>23 is that what we're up to? Sorry, I apologize,</p> <p>24 Exhibit 7. I'm marking as Exhibit 7 the State's</p> <p>25 answers to the public safety union's interrogatories.</p>	<p style="text-align: right;">Page 88</p> <p>1 BROM STIBITZ</p> <p>2 basis for the State's position that there are no valid</p> <p>3 claims that can be asserted against it by the</p> <p>4 pensioners?</p> <p>5 What's the State's position -- why does the</p> <p>6 State feel that the claims raised by the pensioners</p> <p>7 are invalid?</p> <p>8 MS. NELSON: Well, I'm going to object</p> <p>9 because that encompasses the attorney-client</p> <p>10 privileged communications that related specifically to</p> <p>11 the pensioners' claims and the formulation of response</p> <p>12 to this interrogatory.</p> <p>13 MS. RUTNER: So are you instructing your</p> <p>14 witness not to answer?</p> <p>15 MS. NELSON: Yes.</p> <p>16 BY MS. RUTNER:</p> <p>17 Q. And you're going to follow that instruction?</p> <p>18 A. Yes.</p> <p>19 Q. Okay, putting aside the State's position as to the</p> <p>20 validity of any claims brought against it by the</p> <p>21 pensioners, I want to discuss any concerns the State</p> <p>22 may have had about, about the lawsuit, with respect to</p> <p>23 the cost of litigating the lawsuit, the time it might</p> <p>24 take, the bad press it might bring.</p> <p>25 Were there ever discussions that you know</p>

22 (Pages 85 to 88)